

Citation for published version:

Knijn, T, Martin, C & Millar, J 2007, 'Activation as a framework for social policies towards lone parents: is there a continental specificity?', *Social Policy and Administration*, vol. 41, no. 6, pp. 638-652.
<https://doi.org/10.1111/j.1467-9515.2007.00576.x>

DOI:

[10.1111/j.1467-9515.2007.00576.x](https://doi.org/10.1111/j.1467-9515.2007.00576.x)

Publication date:

2007

[Link to publication](#)

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Activation as a Framework for Social Policies towards Lone Parents

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Abstract

This article compares recent social policy reforms in respect of lone-parent families in three different national contexts: France, the Netherlands and the UK. In all three countries there is an increasing focus on activation policies to promote employment among lone parents. The authors examine whether this common framework of activation has led to a policy convergence across these three countries.

Lone-parent families have always been considered as a 'social risk'. Before the development of modern welfare states lone parents depended on their families or on charity, bearing the risk of morally based exclusion, arbitrary treatment and rigid social control. During the heyday of the 'protective' welfare state in the second half of the twentieth century, arbitrariness declined but lone parents continued to be regarded as an exceptional family type, deviating from the regular breadwinner-housewife model (Knijn, 1994; Millar, 1996; Lewis, 1997; Skevik, 2006). However, normative assumptions regarding family structure are now becoming less important in most European countries. Under the new welfare ideology the key normative assumption is that all adults should be in the labour market, even if that means precarious employment (Lewis and Giullari, 2005). The new welfare ideology emphasizes full employment and promotes 'active' social policies to achieve this.

In this article¹, we compare recent social policy reforms for lone parents in three national contexts: France, the Netherlands and the UK. Each of these countries is promoting employment for lone parents, as part of wider welfare state reforms. The main aim of this comparison is to explore whether there are significant differences in activation policies for lone parents between the two continental welfare regimes and the liberal welfare regime of the UK. We thus describe the main reforms of the past decade or so, and seek to highlight similarities and differences. We start with a brief outline of the three national policy trajectories from the social protection model to the current commitment to employment activation. Then we examine the different instruments of these policies and their impact.

From Social Protection to Employment Activation

Under the male breadwinner-female carer model, support for lone parents usually varies according to their previous marital status, with widows treated differently from other lone parents. In the UK, the Beveridge welfare state of the immediate post-war years introduced national insurance benefits for widows and for widowed mothers which provided lifelong support after the death of a husband, but which could be

¹ With thanks to Anne Skevik for her comments on an earlier version of this article.

supplemented by earnings without loss of pension². Other lone parents were reliant upon social assistance benefits which were lower, means-tested and paid until the youngest child reached the age of 16 or 18 if still in full-time education. In the Netherlands, legislation in the late 1950s and early 1970s transformed the previously decentralized and strongly personalized system of poor relief but maintained a clear distinction between the deserving and the undeserving poor (Nelson, 1990). Benefits for widows were paid for by compulsory and collectively paid workers' premiums and were much more generous than the social assistance benefits for divorced and never-married lone-mother households that were paid for by taxation. Widows could rely on the Dutch welfare state for a guaranteed income for the rest of their lives, while for other lone parents this guaranteed minimum income lasted until their children reached 18. Thus in both the Netherlands and the UK non-widowed lone parents were not expected or required to seek employment. Indeed, there was very little financial support available to people in employment, for either low-paid workers or part-time workers. For non-widowed lone parents, therefore, the options were either full-time employment or full-time receipt of benefits and, in the context of an ideology which emphasized the importance of maternal care for children, most 'chose' to stay at home rather than go out to work.

In France, the situation was rather different. The key reforms were in the mid-1970s, when family policies were reformed to support the more fragile households, including lone parents (Le Gall and Martin 1987; Martin, 1995, 1997a, 1997b; Martin-Papineau, 2001). A new allowance, the *allocation de parent isolé* (API, or lone-parent allowance), was created in 1976 to guarantee, for a limited period of time (one year or until the youngest child reaches 3 years of age), a minimum income for all the lone-parent families whose resources were under a predefined threshold. It concerned all lone parents, including fathers. A widow's insurance was introduced in 1980, financed by an employee's contribution and provided on a means-tested basis. The API reform took place in a specific context of creating different minimum incomes³ and the political debate of the time defended this measure as a means to facilitate a 'free choice' between work and life at home or even to pay a 'maternal salary', so that there would be no social discrimination between women who worked and those who devoted themselves exclusively to domestic and caring tasks. The political wish to support lone mothers to care for their young children was explicit.

By the mid-1980s, however, all three systems were coming under increasing criticism, not least as the number of recipients increased. Issues of dependency and disincentives to work became tied up with the appearance of the theme of 'new poverty'. Concern about 'dependence on welfare' appeared in all three countries, and especially in the UK and in France. In the UK there was much negative rhetoric about lone parents in the 1980s, when they were portrayed as selfish and immoral in placing their own needs above those of their children (Kiernan *et al.* 1998). Lone parents were also central to concerns about a supposed 'underclass' of welfare dependants – non-working and non-contributing to society. In France, where the number of API beneficiaries rapidly exceeded the 53,000 initially anticipated, some argued that these policies were having 'perverse effects'. For example, these recipients were suspected

² Although remarriage would end entitlement – as is consistent with the male breadwinner model.

³ The French minimum income, the *Revenu Minimum Insertion* (RMI), was introduced in 1988. It gives a minimum income to those with income below a defined threshold but also includes a contract that requires recipients to participate in 'insertion' activities such as training or education

of hiding the existence of a new partner or even of timing a new birth to continue to receive the benefit. The dependency of these lone parents – mostly lone mothers – on the state was firmly condemned, and proposals to abolish the API were made (Sullerot, 1984; Dumont, 1986). In spite of rising employment rates for French lone mothers in the 1990s, their rates still lagged behind those of married mothers. The numbers of lone parents on API and the *Revenu Minimum Insertion* (RMI) continued to rise, and there was increased concern about the potential lack of work incentives in these benefits. In the Netherlands there was also concern about rising numbers on benefits and issues of cohabitation fraud. Lone parenthood was increasingly perceived as ‘a self-selected life style which no longer requires social protection’ (Bussemaker *et al.* 1997, p116).

There was also a more positively phrased discourse that stressed the importance of independence and emancipation through participation in employment, and the application of this to all adults. Lone parents were thus just to be treated, generally speaking, in the same way as other social assistance recipients. This has perhaps been taken up most strongly in the Netherlands, where activation for lone mothers is part of the total restructuring of the Dutch welfare state into what Gilbert (2002) calls an ‘enabling state’ that promotes ‘self-responsibility’. The government has argued that lone mothers should be treated as ordinary citizens, that motherhood is not any longer an argument for not participating in the labour market. In 1996 lone parents with children above the age of 5 years were required to take up paid work and in 2004 this work requirement was extended to all lone parents, as discussed in more detail below.

In the UK, the Labour government elected in 1997 made a strong anti-poverty argument for focusing on paid employment. As the welfare reform Green Paper put it, ‘work is at the heart of our welfare reform programme . . . paid work is the best route out of poverty’ (DSS, 1998, p3). Lone parents, alongside long-term unemployed, young people, and sick and disabled people, were the key target groups. In France the goal of maintaining a system of minimum income while also sustaining work incentives was central to welfare reform debates, as stated in two official reports at the end of the 1990s (Joint-Lambert, 1998; Belorgey, 2000). When the Raffarin right-wing government came to power in 2002, the issue of reforming the minimum incomes was central on the political agenda, including proposals to increase work requirements for lone parents.

To sum up, we can state that, by the mid- to late 1990s, the policy goals of these three countries were converging on the objective of getting lone-parent families back to work. These policies are part of wider welfare restructuring, and lone parents are increasingly seen as similar to, rather than different from, other social assistance recipients. Activation is promoted as being in the best interests of those affected, including lone parents. Thus the role of the state is to facilitate employment but also to strengthen work requirements as necessary. **New**

Instruments for Activation

In this section, we focus on the specific activation policies and instruments for lone parents that have been introduced during the last decade. For each country in turn we provide a description of the nature of these, how they have been implemented, and what impact they have had upon lone parents.

France

Activation programmes. Promoting activation policies has been the main trend of French welfare reforms during the last decade. This concerns all the fragile categories of the population, including minimum income recipients. Faced with the challenge of rising unemployment, the successive right-wing governments of Raffarin (May 2002 to May 2005) and de Villepin (May 2005 to May 2007) have intensified activation policies, with the objective of reducing both the high level of unemployment and the number of recipients of minimum incomes. To reduce the cost of unemployment, a reform of the insurance scheme was implemented in January 2006, including stricter rules of entitlement to obtain an allowance and reductions in the duration of the compensation. With the latter, according to the left-wing syndicate (CGT), about 100,000 unemployed people will see the duration of their allowance reduced by half (from 23 to 12 months). On the other hand, a strong focus is being put on measures to help them come back on the labour market (access to training and qualifications, *validation des acquis* – validation of experience – etc.).

The global orientation of the reforms corresponds to the ‘make work pay’ philosophy, generally attributed to the UK’s ‘Third Way’. It has two dimensions: first to subsidize employers by reducing their social security contributions as an incentive to offer low-qualified jobs, but second, to subsidize at the same time employees to encourage them to accept these jobs, by an increase in social transfers and/or by the possibility to cumulate income support with a salary. However, most of the financial support goes to the employer (80 per cent) rather than to the employee (20 per cent). The total reduction in employers’ social security contributions corresponds to about 20 billion euros in 2005, with about 16 billion of this relating to tax exemptions for low-paid jobs.

The specific instruments of these reforms include the employment premium (*prime pour l’emploi*), tax credits, and the welfare to work incentives for minimum income recipients, called *mécanismes d’intéressement*. The *mécanisme d’intéressement*, which allows minimum income recipients to cumulate a salary with the RMI or API, was reformed in 2001, to allow the minimum income to be paid alongside salary for six months (Rastier and Maingueneau, 2006). For the following nine months, half of the salary is taken into account. Two further measures have also been introduced, which require (in principle at least) minimum income recipients to take up work. For the *revenu minimum d’activité*, created in 2004, this is in the market sector, for 6 or 12 months, at a minimum of 20 hours per week, paid at the minimum wage. For the *contrat d’avenir*, created in March 2006, this is in the voluntary sector⁴ for 24 months for an average of 26 hours per week. These measures are intended to provoke a return to employment for minimum income recipients. By September 2006, there were 44,700 people on the *contrat d’avenir* and 9,200 people on the *revenu minimum d’activité* (RMA). In total, the participants in the various different schemes (*mesures d’intéressement*, RMA and *contrat d’avenir*) amounted to about 158,300 people in September 2006, with an increase over the previous twelve months of about 8.8 per cent.

Individualized and decentralized management. To implement these reforms, some non-financial incentives have been introduced, which correspond to a new

⁴ Also in territorial communities

individualized management: called *politique d'accompagnement*. All minimum income recipients receive a notification from the social services to take stock of their situation, but with the offer of training, etc. On the one hand, this individualized management acts as a control and in some cases, when a recipient does not reply to these notifications, he/she may be struck off and lose the allowance. On the other hand, it is a support for the beneficiaries in order to help them to leave the scheme by accessing the labour market and a salary. In any case, it emphasizes the individual responsibility of the recipients.

The decentralization of the RMI since December 2003 reinforced this perspective. The explicit objective was to increase the efficiency of the minimum income scheme, to facilitate the individualized follow-up of each beneficiary and to reinforce the work obligation. But it has had different impacts in terms of work obligation depending on the local authorities, creating important local variations (Le Bihan *et al.* 2006). The same orientation has been implemented for API beneficiaries by the administration of the *caisses d'allocations familiales*. Each recipient receives a notification in order to be informed of his/her rights but also to control conditions of access to the allowance (level of income, absence of a partner). Again, the aim is to control but also to help and sometimes (no national data on this point) to a striking off. In October 2006, a new committee was created: the *Comité national de lutte contre la fraude en matière de protection sociale*, whose role is precisely to reinforce the controls in the social security administrations, with a specific focus on income support recipients, considered as at-risk users (Warin, 2006).

The impact. For the minimum income recipient, the impact is still relatively limited. The number of API or RMI recipients, whether they are lone parents or not, who also receive a salary has been more or less stable from 2000 to 2005 at 12 to 13 per cent for RMI (about 143,000 people) and 5 to 6 per cent for API (about 11,500 people) (Nivière *et al.* 2006). For API recipients, it is necessary to distinguish between two main types of situation – what the administration calls the ‘long’ or ‘short’ API. Long API refers to women who are pregnant or whose younger child is less than 3 years old; short API to those having older children, receiving the allowance for a maximum of a year, after a separation, a divorce or the death of a partner. The percentage of recipients of the ‘short API’ who cumulate a salary and this minimum income is 8.5 per cent, almost double that of the ‘long API’ recipients (4.4 per cent). This reflects, first, the problem of reconciliation between work and childcare for those who have a young child, including the problem of atypical working hours which compromise access to public childcare arrangements (Le Bihan and Martin, 2004) and, second, the young age of these mothers, who are more often still training or studying.

The Netherlands

Activation programmes. In general, lone mothers on social assistance rely on the same measures and programmes for activation and reintegration as do other people on social assistance. Important policy measures in this context are activating measures – such as sharpening work obligations, stricter sanctions for not meeting work obligations, a redefinition of what constitutes a ‘suitable job’, tax reductions for working people, etc. Having care responsibilities for (young) children may be treated as a ‘social reason’ for individual exemptions, and financial incentives like premiums are offered for finishing a teaching programme considered necessary for reintegration,

for accepting a job, or for being engaged in voluntary work in the context of social activation.

Concerning work obligation, there has been some recognition of the need for support to enable lone mothers to combine paid work with care, and various measures have been introduced or extended. First, a tax credit was introduced for low-wage households, which also applied to part-time workers. Second, care leave includes maternity leave (16 weeks around the birth of the child, paid leave) and both parents have the right to unpaid parental leave (at a maximum of half of their working time during a period of 6 months) if they have worked for the same employer for a minimum of one year. Employers are not obliged to pay the parent during this leave, but are stimulated to do so by a tax award if they pay at least 70 per cent of the minimum wage to which their employee is entitled. Third, since 2003 employees have the right to ask their employer to either increase or reduce their working hours. Fourth, the provision of childcare has been privatized since 2005, in order to improve quality and to control costs. Working lone parents' costs for childcare are reimbursed with a tax credit if their income is less than 130 per cent of the minimum wage. Welfare recipients with children who participate in a recognized reintegration trajectory are entitled to childcare. Lone parents returning to paid work afterwards are entitled to a reimbursement of 90 per cent of the costs of childcare, although this will be reduced to 10 per cent in 2008 (SZW, 2005).

Individualized and decentralized management. The so-called 'individualization principle' – the adjustment of provision to individual need – has always been a central feature of the Dutch social assistance system. During the last decade, decentralization has been strongly pursued because transforming welfare states into active welfare states is also seen as a process of activating the institutional context of the management, implementation and delivery of these policies. This has meant considerable local variation in provisions and outcomes. Studies evaluating the implementation of the first transformation of the social assistance policy at the end of the 1990s found rather large inter-municipal differences in the compensation of childcare costs, part-time work premiums and work-income disregards (Knijn and Van Wel, 1999; Engelen *et al.* 1999). More generally, municipalities may adopt different strategies in activating lone parents on Social Assistance and have substantial discretion in deciding whether or not lone parents should have work obligations.

The impact. Two studies, by Knijn and Van Wel (1999) and by the Dutch General Audit Office (TK 2003), describe the results of the activation of lone parents on Social Assistance and give some insight into what the policy reforms described above mean in practice. Both studies conclude that the number of (partial) exemptions from work obligations is high as a whole, and even more so for lone parents. Since 1996, the proportion of Social Assistance clients fully released from work obligations has increased to about 50 per cent in some municipalities. Also, the General Audit Office's report found that 62 per cent of lone parents on Social Assistance were made an activation offer between 1999 and September 2002. Lone parents with children under 5 are strongly represented among those to whom no offer has been made. In the case of these lone parents, many municipalities only take action when these parents ask for it: a quite 'narrow' interpretation of the voluntary character of activation for this group. Finally, the report showed that, over a period of 14 months in 2001 and

2002, about 20 per cent of lone parents left Social Assistance but 70 per cent of the lone parents that started work in this period are still partly dependent on Social Assistance. Apparently, these lone parents do not earn sufficient income from work to exceed the Social Assistance level. These figures reflect the fact that many lone parents, when engaged in paid work, work part-time and earn insufficient income to become fully independent from Social Assistance. This raises serious doubts regarding the feasibility of two closely connected objectives: fighting poverty, and raising the outflow from Social Assistance of lone parents to a similar level as the outflow of other Social Assistance recipients.

In view of the high poverty rates among lone-mother families, these are not minor considerations (Knijn and Van Berkel, 2003). This is rather embarrassing when one takes into account the booming Dutch economy of the late 1990s and the rising prosperity among other categories of the population. Lone mothers' problems in getting out of poverty result from their reliance on part-time work and from the low educational level of most of them: they can only earn low wages in the highly segregated lowest segments of the labour market. Knijn and Van Wel (1999) showed that lone mothers who have at the most a lower vocational education will have to work at least 32 hours per week to earn an income that will make them independent of Social Assistance, while lone mothers with a higher professional or academic level can do so with hours a week. Less educated lone mothers need to work full-time in order to have any financial advantage, and that is exactly what most of them do not want.

All in all, the report of the General Audit Office is quite critical in its conclusion concerning the activation efforts directed at lone parents on Social Assistance. It states that the national government has paid insufficient attention to steering the activation of lone parents, and has neglected to operationalize the comprehensive approach into concrete targets. Moreover, local policies, first, reflect ideological and political considerations and, second, are the consequence of the fact that local social offices decided autonomously on the work obligations while the budgets for social assistance were paid for nationally. Therefore, a reduction in beneficiaries had no financial implications for local budgets, until the introduction of the Work and Welfare Act (Wet Werk en Bijstand) in 2004. That new Act shifted the budgets for Social Assistance to the municipalities in order to force them to get more people out of welfare. If they are not successful, the municipalities will feel it in their purse.

The UK

Activation programmes. The 'New Deal' programmes were started in 1997 with the New Deal for Lone Parents (other programmes target young people, the long-term unemployed, older workers, sick and disabled people and partners of unemployed claimants). The programme for lone parents is voluntary and offers a mix of job-search support, training and practical help to make the transition to work. Lone parents receiving income support are required to attend 'work-focused' interviews at regular intervals and benefits can be reduced if these are not attended. But there is no requirement to participate in the New Deal or to be available for work. Financial support for employment has been substantial in order to increase financial incentives to work and reduce the risk of in-work poverty. These fiscal measures are central to the government aspiration to end child poverty and include the introduction of a national minimum wage, reductions in tax and national insurance contributions, and –

most importantly – the introduction of a new system of income transfers to working people, in the form of tax credits. There were two tax credits introduced in 2003. The Child Tax Credit provides means-tested support to most (about nine in ten) families with children, with more help going to non-working and low-paid families. The Working Tax Credit is targeted on low-wage earners. Those with children are eligible if they work for 16 or more hours per week. Childless people may also be eligible but only if they are aged 25 and over and working at least 30 hours per week. The Working Tax Credit also includes a childcare costs element, which is restricted to single-earner couples and lone parents who are using formal care, and pays 70 per cent of costs up to a fixed maximum amount.

There have also been a series of general measures intended to promote ‘work/life balance’ – improvements to maternity and parental leave, rights to flexible working for parents of disabled children or those aged under 6 (Williams, 2005; Millar 2006a). The national childcare strategy has the aim of increasing the provision of nursery education and other childcare services.

Individualized management and local pilot programmes. The New Deal programmes, including the New Deal for Lone Parents, represent an attempt to introduce more of a system of individual case management into the UK. The New Deal ‘personal advisers’ are central to this. Each participant in the programme is allocated a personal adviser, who provides individual advice and assistance, including help with job search, with working out the financial implications of working, with claiming in-work tax credits and benefits, with finding childcare, and with financial support to meet the costs of making the transition into work. There is some, but fairly limited, opportunity for education and training, but the main focus is on getting lone parents into employment (Millar, 2006b). The personal advisers can offer some support in the first few months in work, to help lone parents to sustain employment.

There are also currently a number of pilot and demonstration projects which are extending the provision of support to help sustain employment. For example, lone parents in the ‘New Deal Plus’ areas can receive an in-work credit (which pays £40 per week for the first 12 months in work) and access an in-work emergency fund pilot (which provides discretionary financial support for specific needs in the first 60 days in work). The Employment Retention and Advancement Demonstration Project is testing the impact of the provision of financial incentives and job coaching in work on employment retention, and includes sole parents among the target groups (Hoggart *et al.* 2006; Dorsett *et al.* 2007).

The impact. The UK government has set a specific target that 70 per cent of lone parents should be employed by 2010. Their employment rates have been rising and are now at about 56 per cent, compared with about 42 per cent in 1994. By February 2007, about 748,000 sole parents had taken part in the New Deal for Lone Parents, and about 498,000 had moved into employment (DWP, 2007a). The evaluation of the New Deal shows that it is effective in increasing employment, and also that it is generally popular with those lone parents who have taken part (Evans *et al.* 2003). Tax credits are being received by about one million employed lone mothers and the amounts involved are substantial. For example, in April 2006 a lone mother with one child under 11 working for 20 hours at the national minimum wage of £5.05 per hour would receive about £63 in Working Tax Credit, and about £44 in Child Tax Credit,

as well as about £12 in housing and council tax benefit, and £17 in Child Benefit. Thus more than half of her income in work would come from state transfers. The financial help available from tax credits plays a very important role in helping lone parents to take up, and stay in, employment (Hirsch and Millar, 2004). The total number of registered childcare places for children aged below 8 has doubled since 1997, and there are now about 1.2 million places, one for every five children. Further increases are planned over the next five to ten years (HM Treasury, 2006).

Gregg *et al.* (2006) review the evidence on the direct impact of policy on lone-parent employment. They conclude that since 1999 policy changes have increased lone-parent employment by about five percentage points. The rest of the increase is due to changes in the characteristics of lone parents and the generally buoyant labour market conditions in the UK. However, it is unlikely that the government will reach the 70 per cent employment target by 2010. Child poverty rates (defined as below 60 per cent of median income, after housing costs) for lone-parent families have also fallen from 55 per cent in 2001/2 to 48 per cent in 2004/5, but it looks unlikely that the targets for reductions in child poverty will be reached (Harker, 2006). There is therefore now discussion about what further policies or provisions are needed. A recent review of the direction and nature of welfare reform (Freud, 2007) has proposed that lone parents with a youngest child aged 12 and above should be subject to the same work requirements as an unemployed claimant and work requirements be extended to sole parents with progressively younger children from 2010. This is justified by two main arguments. The first relates to the well-being of sole parents and their children ('having a job makes families materially better off . . . work also improves the quality of life and well-being of parents and their children'; 2007, p46). The second reason is that the government support offered through the tax credit and childcare provisions is now, or soon will be, at sufficient levels to make it reasonable to require sole parents to work. The government has broadly accepted this argument and from October 2008 lone parents with a child aged 12 and over will no longer be entitled to income support. Instead, they will only be entitled to Jobseeker's Allowance and so subject to the same availability for work requirements as unemployed claimants. From 2010, this age will be reduced to 7 (DWP, 2007a).

Conclusion

First, lone parents face a changing environment of social protection in these three countries, as this policy review has shown. In each country, there has been a shift away from the model of supporting lone mothers to be full-time mothers at home towards an employment-based model. In France the support for some lone parents to stay at home is increasingly tempered by work incentives and work requirements. In the Netherlands lone parents are in theory now subject to the same work obligations as other income support recipients – with the exception of lone mothers of children under 5 – since 2007. In the UK, the rhetoric, focus and direction of policy is towards encouraging and supporting employment, moving towards more compulsory work-related requirements. Lone parents with children aged 12 and over will now be treated in the same way as unemployed claimants in general.

All three countries have changed their rules around work obligations for people receiving income support or minimum incomes. Increasingly, lone parents are seen not so much as a special category (of mothers with care obligations), but as part of the wider group of 'workless' families or the 'hidden' unemployed. This larger group is

the focus of policy attention. Although this strategy in general may contribute to the increase in employment and decrease in poverty among lone parents, many obstacles still remain, such as the incompatibility between low-paid, part-time and atypical jobs and caring responsibilities. In spite of some measures concerning paid leave and childcare, there is no systematic prevention of a one-sided implementation of the strategy: introducing work obligations without creating conditions and facilities to realize these, such as paid leave, good-quality childcare, training and reintegration programmes that fit lone parents, and income protection in between precarious jobs. In particular lone-parent families are at risk since they lack the security of a second wage or a second caretaker in the family with whom they can share the burden. As each of the countries under focus has experienced increases in the numbers of the working poor, this activation strategy is far away from an exclusive solution guaranteeing a 'good investment strategy in childhood' – as the increasing poverty rate of children, in particular those in lone-parent families, shows (Esping-Andersen 2002).

Second, these countries have also all introduced or increased financial support for employment, such as means-tested transfers and taxation. However, there are differences in the specific ways in which this has been done. In France, there are provisions for minimum income to remain in payment during the first 15 months in work. In the Netherlands, social assistance guarantees a minimum income if wages are below the minimum. In addition employed lone parents receive (additional) tax credits and get free childcare if their income is below 130 per cent of the minimum wage. In the UK, the child tax credit is paid to families regardless of work status and the working tax credit is specifically intended as a supplement for low wages. Increased expenditure on supporting working people is a key element in activation policies and social security budgets are being retargeted to support employment.

Third, there has also been increasing policy attention to the need for support of various types of working parents – in respect of maternity leave, parental leave, flexible working, and childcare services and subsidies. France was already much ahead of the other two countries in these respects, and both the Netherlands and the UK started from a very low base, in comparison with other northern European countries. But 'family-friendly' employment and 'work/life balance' are now clearly on the policy agenda, either at the European or at the national level. Again, there is less focus on lone parents *qua* lone parents and more on the general needs of working parents (or, more specifically, working mothers).

Fourth, in each of these countries there is a strong focus on the importance of tailor-made and individualized social interventions in activation. Several evaluation studies of activation have made clear that activation is most successful when the activation offers made to clients meet their needs, wishes and capacities (Van Berkel and Valkenburg, 2006). Against this background, the increasing emphasis on obligatory activation seems to have a double aim. It should not only activate the target groups, as it is often interpreted, but also the institutions responsible for its implementation. Reforming these institutions (whether they operate at the local level, as in the Netherlands and France, or at the national level, as in the UK) is thus a key part of ongoing welfare restructuring. This has proceeded with differing degrees of success. In the Netherlands local municipalities sometimes act to exclude lone parents from support. In the UK, the commitment to individual and tailor-made support is limited

by low resources in staff time and training. The extent to which these services can be developed to match the circumstances, needs and wishes of policy clients will be crucial in future debates over compulsory versus voluntary activation. When activation offers can be transformed from 'an offer you can't refuse' into 'an offer you won't refuse', the issue of work obligations will lose much of its controversial nature.

However, we should also note that policy is not standing still in these areas. In France, the new Fillon right-wing government (since May 2007) has a project to implement a proposition made by Martin Hirsch, a left-wing high civil servant who has agreed to lead the new *Haut commissariat aux solidarités actives contre la pauvreté*. The objective is to experiment a *revenu de solidarité active* for RMI and API recipients, in order to optimize the system of *intéressement* in three ways: (1) by extending this system to the beneficiaries of the RMA and of the *contrats d'avenir* who were excluded from this incentive, (2) by improving the *intéressement* of the part-time workers (below half-time), and (3) by simplifying the different helps into a single premium. In the Netherlands the coalition of Christian democrats and social democrats has recently again freed lone parents with children below the age of 5 from any work obligation, which illustrates the indecisive policies concerning these parents. Also, a new, more promising law has been accepted (but not yet implemented), that tries to find a solution for part-time working lone parents, guaranteeing them the right to payments for care in addition to a part-time job. In the UK there is ongoing debate about the rights and responsibilities of lone parents, and how far to develop work obligation for this group, and new availability for work requirements are to be introduced for lone mothers with older children (aged 12 and above) initially, and to be extended to those with children aged 7 in the next few years.

The extent to which these policies represent a sharp break with the past varies across the three countries. Until the mid-1990s, France was the archetype of the 'social exclusion' rhetoric, which emphasized the state's responsibility to help more fragile citizens. But in the past five years, policy-makers have increasingly promoted workfare arguments and reforms and abandoned the 'social exclusion' rhetoric. The 'dependence' argument and the development of control procedures and practices can be interpreted as a significant step towards a more 'defensive workfare' (Lødemel and Trickey, 2000). The recent compromise to accept a left-wing high civil servant's proposition may be interpreted as a hesitation to reinforce this logic of workfare, but we must still wait for the implementation and the evaluation.

The Netherlands appears to have been the toughest of our three countries by legally obliging lone parents to work without any exception for having young children, without paid parental leave and even without introducing reintegration programmes that fit lone parents. This country developed within ten years a 'shock and awe' policy towards lone parents as if it wished to forget its traditional image as a 'motherhood-protecting' nation overnight. Dutch politicians, however, seem not to be quite sure of their case, hence the agreement of the new government to free lone mothers with young children (aged under 5) from the work obligation. In the UK, arguably, these policies for lone parents are less a break with the past, in that reform has proceeded relatively cautiously, and the employment activation policies have been introduced alongside a commitment to ending child poverty – although that in itself is a

significant change from the 1980s, when UK conservative governments denied the existence of poverty. But the UK seems to be at a turning point now, ready to shift more decisively to the 'adult-worker' model.

In this process, the hypothesis of convergence is attractive. Nevertheless, it seems more appropriate to consider that each national case is moving towards a common European or even global objective, but by a process of adaptation of its previous system. The importance of the turning point varies across countries. The idea of an alignment is a more adequate way of conceptualizing these changes. However, the theory of continental specificity seems weak once we take social assistance and activation policies into account. The common traits seem larger than the differences between these three welfare states.

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